

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION**

MDL No. 16-2738 (MAS) (RLS)

***THIS DOCUMENT RELATES
TO ALL CASES***

**THE PLAINTIFFS' STEERING COMMITTEE'S MOTION TO
QUASH OR FOR PROTECTIVE ORDER REGARDING SUBPOENA
DIRECTED AT PAUL HESS**

PLEASE TAKE NOTICE that, at 9:00 a.m. on June 17, 2024, or at such other time as set by the Court, Plaintiffs, by and through the Plaintiffs' Steering Committee (PSC), will Move to Quash or for Protective Order Regarding Subpoena Directed at Paul Hess.

As fully discussed in Plaintiff's Memorandum of Law in Support of this Motion, the Court should quash, or in the alternative issue a protective order, regarding Johnson & Johnson's subpoena to Paul Hess because the discovery it seeks is irrelevant, disproportionate to the needs of this case, and unduly burdensome. It also improperly seeks discovery from a non-testifying expert, and risks revealing privileged and protected documents and communications.

Plaintiffs respectfully request that the Court grant the Motion to Quash or For Protective Order Regarding Subpoena Directed at Paul Hess. A proposed order is attached for the Court's consideration.

Dated: May 17, 2024

Respectfully submitted,

/s/ Michelle A. Parfitt

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CERTIFICATE OF SERVICE

I hereby certify that on May 17, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive services in this MDL.

Respectfully submitted,

/s/ P. Leigh O'Dell
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